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January 20, 2022

Via: ECF

Honorable Ronnie Abrams
United States District Court Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Besiso et al v Barnes et al.
Case Number: 1:16-cv-09461-RA

Dear Judge Abrams:

We represent Defendant DeMarcus Cousins in the above referenced matter.

On January 6, 2022, Your Honor granted plaintiff's application to extend the discovery deadline to March 4, 2022, for plaintiff to substitute a neurological expert. At this time, any motions for summary judgment are due on or before February 11, 2022.

Considering the discovery extension, we will likely need additional time to determine how to respond to the plaintiff's upcoming expert disclosure. In light of the foregoing, we respectfully request for the court to extend the deadline to file a summary judgment motion to April 15, 2022.

Thank you for your consideration of this application.

Respectfully,

WADE CLARK MULCAHY LLP

Corey Morgenstern
Corey Morgenstern
CM/cr

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'R. Abrams', written over a horizontal line.

Hon. Ronnie Abrams
1/21/2022